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SEALED

IN THE UNITED STATES DISTRICT COURT
 DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

EMMETTE JAMES KIBODEAUX (aka
 "LITTLE CRAZE"),
 TAIESHA ANN KIBODEAUX,
 LESLIE EUGENE GITTOES (aka "BIG
 CRAZE"), and
 ISRAEL LUIS GONZALEZ,

Defendants.

INDICTMENT

Count I: 18 U.S.C. §§ 371 and 924(n),
 Conspiracy to Travel Interstate with
 Intent to Engage in the Business of
 Dealing Firearms without a License (E.
 KIBODEAUX, T. KIBODEAUX,
 GITTOES, and GONZALEZ);

Count II: 18 U.S.C. § 1956(h),
 Conspiracy to Commit Money
 Laundering (E. KIBODEAUX, T.
 KIBODEAUX, GITTOES, and
 GONZALEZ);

Counts III and IV: 18 U.S.C. § 922(a)(6),
 False Statement During Acquisition of
 Firearms (GONZALEZ);

Counts V and VI: 18 U.S.C. § 922(a)(6),
 False Statement During Acquisition of
 Firearms (T. KIBODEAUX);

Count VII: 18 U.S.C. § 922(g)(1), Felon
 in Possession of Firearms and
 Ammunition (E. KIBODEAUX).

Case: 1:22-cr-00054
 Assigned To : Sam, David
 Assign. Date : 4/27/2022

The Grand Jury charges:

COUNT I

18 U.S.C. §§ 371 and 924(n)

(Conspiracy to Travel Interstate with Intent to Engage in the Business of Dealing Firearms without a License)

Beginning on a date unknown to the Grand Jury, but not later than September 2020 and continuing through at least August 2021, within the District of Utah and elsewhere,

EMMETTE JAMES KIBODEAUX (aka "LITTLE CRAZE"),
TAIESHA ANN KIBODEAUX,
LESLIE EUGENE GITTOES (aka "BIG CRAZE"), and
ISRAEL LUIS GONZALEZ,

defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with others known and unknown, to travel interstate between the District of Utah and elsewhere, with intent to engage in the business of dealing in firearms without a license and in the course of such business to receive and transport firearms in interstate commerce without a license; all in violation of 18 U.S.C. §§ 371, 924(n), and 922(a)(1)(A), and punishable pursuant to 18 U.S.C. § 371. Counts III, IV, V, and VI allege overt acts committed in furtherance of the conspiracy and are incorporated herein.

COUNT II

18 U.S.C. § 1956(h)

(Conspiracy to Commit Money Laundering)

Beginning on a date unknown to the Grand Jury, but not later than September 2020 and continuing through at least August 2021, within the District of Utah and

elsewhere,

EMMETTE JAMES KIBODEAUX (aka "LITTLE CRAZE"),
TAIESHA ANN KIBODEAUX,
LESLIE EUGENE GITTOES (aka "BIG CRAZE"), and
ISRAEL LUIS GONZALEZ,

defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with others known and unknown to commit the following offenses against the United States of America in violation of 18 U.S.C. § 1956:

(a) to knowingly conduct and attempt to conduct financial transactions, such as the purchase and sale of firearms, bank deposits, bank withdrawals, Cash App payments, Zelle payments, payments for lodging, payments for fuel, and payments for rental vehicles, all affecting commerce, which involved the proceeds of specified unlawful activity, specifically,

(i) Interstate Travel with the Intent to Engage in the Business of

Dealing Firearms without a License in violation of 18 U.S.C. § 924(n);

with the intent to promote the carrying on of specified unlawful activity, outlined in (i) above, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions represented proceeds of some form of unlawful activity, all in violation of 18 U.S.C. §§ 1956(h) and 1956(a)(1)(A)(i) and punishable pursuant to 18 U.S.C. § 1956(a)(1).

COUNT III

18 U.S.C. § 922(a)(6)
(False Statement During Acquisition of Firearms)

On or about October 22, 2020, in the District of Utah,

ISRAEL LUIS GONZALEZ,

defendant herein, in connection with the acquisition of firearms, to wit:

- HS Produkt XD9 9mm semi-automatic pistol, s/n BY432035
- Springfield Armory 1911A1 9mm semi-automatic pistol, s/n NM674748

from a licensed firearm dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement intended and likely to deceive the firearm dealer with respect to any fact material to the lawfulness of such acquisition of the firearms, in that he falsely answered “yes” on ATF form 4473 asking whether he was the actual transferee/buyer of the firearms and, as he then knew, his answer was untrue; all in violation of 18 U.S.C. § 922(a)(6), and punishable pursuant to 18 U.S.C. § 924(a)(2).

COUNT IV

18 U.S.C. § 922(a)(6)
(False Statement During Acquisition of Firearms)

On or about October 27, 2020, in the District of Utah,

ISRAEL LUIS GONZALEZ,

defendant herein, in connection with the acquisition of firearms, to wit:

- Taurus PT24/7 PRO DS .40 caliber semi-automatic pistol, s/n SCS12664
- Charter Arms Bulldog .44 caliber revolver, s/n 20F12183

- Smith & Wesson SW40VE .40 caliber semi-automatic pistol, s/n RAL0691
- Smith & Wesson SD40VE .40 caliber semi-automatic pistol, s/n FCR7177

from a licensed firearm dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement intended and likely to deceive the firearm dealer with respect to any fact material to the lawfulness of such acquisition of the firearms, in that he falsely answered “yes” on ATF form 4473 asking whether he was the actual transferee/buyer of the firearms and, as he then knew, his answer was untrue; all in violation of 18 U.S.C. § 922(a)(6), and punishable pursuant to 18 U.S.C. § 924(a)(2).

COUNT V

18 U.S.C. § 922(a)(6)
(False Statement During Acquisition of Firearms)

On or about December 9, 2020, in the District of Utah,

TAIESHA ANN KIBODEAUX,

defendant herein, in connection with the acquisition of firearms, to wit:

- HS Produkt XDS .45 caliber semi-automatic pistol, s/n AT104928
- HS Produkt XDS .45 caliber semi-automatic pistol, s/n AT104948

from a licensed firearm dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement intended and likely to deceive the firearm dealer with respect to any fact material to the lawfulness of such acquisition of the firearms, in that she falsely answered “yes” on ATF form 4473 asking whether she was the actual transferee/buyer of the firearms and, as she then knew, her

answer was untrue; all in violation of 18 U.S.C. § 922(a)(6), and punishable pursuant to 18 U.S.C. § 924(a)(2).

COUNT VI

18 U.S.C. § 922(a)(6)
(False Statement During Acquisition of a Firearm)

On or about April 19, 2021, in the District of Utah,

TAIESHA ANN KIBODEAUX,

defendant herein, in connection with the acquisition of a firearm, to wit:

- Taurus G2C 9mm semi-automatic pistol, s/n ACC604620
- Taurus G2C 9mm semi-automatic pistol, s/n ACC604633
- Taurus G2C 9mm semi-automatic pistol, s/n ACB600463

from a licensed firearm dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement intended and likely to deceive the firearm dealer with respect to any fact material to the lawfulness of such acquisition of the firearm, in that she falsely answered “yes” on ATF form 4473 asking whether she was the actual transferee/buyer of the firearm and, as she then knew, her answer was untrue; all in violation of 18 U.S.C. § 922(a)(6), and punishable pursuant to 18 U.S.C. § 924(a)(2).

COUNT VII

18 U.S.C. § 922(g)(1)
(Felon in Possession of Firearms and Ammunition)

On or about January 27, 2022, in the District of Utah,

EMMETTE JAMES KIBODEAUX (aka "LITTLE CRAZE"),

defendant herein, knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms and ammunition, to wit:

- CZ CZ57 7.62 x 25mm semi-automatic pistol, s/n Y7867
- Smith & Wesson M&P 15 5.56 caliber rifle, s/n TS98943
- Taurus G3 9mm semi-automatic pistol, s/n ABK019390
- Taurus 65 .357 caliber revolver, s/n MB521331
- Associated ammunition

and the firearms and ammunition were in and affecting commerce, all in violation of 18 U.S.C. § 922(g)(1).

NOTICE OF INTENT TO SEEK FORFEITURE

Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction for any offense violating 18 U.S.C. §§ 922 and/or 924, the defendants shall forfeit to the United States of America any firearm or ammunition involved in or used in the commission of the offense, including but not limited to:

- HS Produkt XD9 9mm semi-automatic pistol, s/n BY432035
- Taurus PT24/7 PRO DS .40 caliber semi-automatic pistol, s/n SCS12664
- HS Produkt XDS .45 caliber semi-automatic pistol, s/n AT104928
- Taurus G2C 9mm semi-automatic pistol, s/n ACC604620
- CZ CZ57 7.62 x 25mm semi-automatic pistol, s/n Y7867
- Smith & Wesson M&P 15 5.56 caliber rifle, s/n TS98943
- Taurus G3 9mm semi-automatic pistol, s/n ABK019390
- Taurus 65 .357 caliber revolver, s/n MB521331
- Associated ammunition

Pursuant to 18 U.S.C. § 982(a)(1), upon conviction for any offense in violation of 18 U.S.C. § 1956(h), the defendants shall forfeit to the United States of America any

property, real or personal, involved in the money laundering conspiracy, and any property traceable to such property. The property to be forfeited includes, but is not limited to:

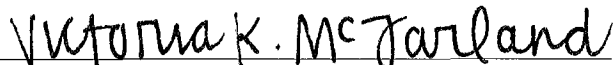
- HS Produkt XD9 9mm semi-automatic pistol, s/n BY432035
- Taurus PT24/7 PRO DS .40 caliber semi-automatic pistol, s/n SCS12664
- HS Produkt XDS .45 caliber semi-automatic pistol, s/n AT104928
- Taurus G2C 9mm semi-automatic pistol, s/n ACC604620
- CZ CZ57 7.62 x 25mm semi-automatic pistol, s/n Y7867
- Smith & Wesson M&P 15 5.56 caliber rifle, s/n TS98943
- Taurus G3 9mm semi-automatic pistol, s/n ABK019390
- Taurus 65 .357 caliber revolver, s/n MB521331
- Associated ammunition
- Substitute property as allowed by 18 U.S.C. § 982(b)

A TRUE BILL:



FOREPERSON OF GRAND JURY

ANDREA T. MARTINEZ
United States Attorney


VICTORIA K. McFARLAND
SAMUEL S. PEAD
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